

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

Plaintiff,

v.

MIGUEL ANGEL MORALES-
ESTRADA,

Defendant.

NO: 2:20-CR-0187-TOR

STIPULATED PROTECTIVE ORDER
REGARDING IDENTIFICATION OF
MINOR VICTIMS PURSUANT TO 18
U.S.C. § 3509

BEFORE THE COURT is the Parties' Stipulation for Protective Order
Regarding Identification of Minor Victims Pursuant to 18 U.S.C. § 3509. ECF No.
21. The matter was submitted for consideration without oral argument. Having
reviewed the file and the records contained therein, the Court is fully informed.

Good Cause having been shown, the Court hereby Orders that the
Stipulation for Protective Order Regarding Identification of Minor Victims
Pursuant to 18 U.S.C. § 3509 filed by the parties is GRANTED.

STIPULATED PROTECTIVE ORDER REGARDING IDENTIFICATION OF
MINOR VICTIMS PURSUANT TO 18 U.S.C. § 3509 ~ 1

1 ACCORDINGLY:

2 1. IT IS ORDERED that the privacy protection measures mandated by 18
3 U.S.C. § 3509(d), which apply when a case involves a person under the age of
4 eighteen years who is alleged to be a victim of a crime of sexual exploitation, or a
5 witness to a crime committed against another person, apply to this case.

6 2. IT IS FURTHER ORDERED that all persons acting in this case in a
7 capacity described in 18 U.S.C. § 3509(d)(1)(B), shall:

- 8 a. Keep all documents that disclose the names, identities, or any other
9 information concerning minors in a secure place to which no person
10 who does not have reason to know their contents has access;
- 11 b. Disclose such documents or the information in them that concerns
12 minors only to persons who, by reason of their participation in the
13 proceeding, have reason to know such information;
- 14 c. Not permit Defendant himself to review discovery outside the
15 presence of defense counsel or a defense investigator;
- 16 d. Not permit Defendant to keep discovery in his own possession outside
17 the presence of defense counsel or a defense investigator; and
- 18 e. Not permit Defendant to keep, copy, or record the identities of any
19 minor or victim identified in discovery in this case.
- 20

1 3. IT IS FURTHER ORDERED that all papers to be filed in Court that
2 disclose the names or any other information identifying or concerning minors shall
3 be filed under seal without necessity of obtaining a Court order, and that the person
4 who makes the filing shall submit to the Clerk of the Court:

5 a. The complete paper to be kept under seal; and

6 b. The paper with the portions of it that disclose the names or other
7 information identifying or concerning children redacted, to be placed
8 in the public record.

9 4. IT IS FURTHER ORDERED that the parties and the witnesses shall not
10 disclose minors' identities during any proceedings connected with this case. The
11 parties and witnesses will refer to alleged minor victims only by using agreed-upon
12 initials or pseudonyms (e.g., "Minor Victim 1"), rather than their bona fide names,
13 in motions practice, opening statements, during the presentation of evidence, in
14 closing arguments, and during sentencing.

15 5. IT IS FURTHER ORDERED that the government may produce discovery
16 to the defense that discloses the identity and images of alleged minor victims in
17 this case, in order to comply with the government's discovery obligations.
18 Defendant, the defense team, Defendant's attorneys and investigators, and all of
19 their externs, employees, and/or staff members, shall keep this information
20 confidential as set forth above.

1 6. IT IS FURTHER ORDERED that this ORDER shall apply to any
2 attorneys who subsequently become counsel of record, without the need to renew
3 or alter the ORDER.

4 7. IT IS FURTHER ORDERED that this ORDER shall apply to the personal
5 identifying information and images of any minors who are identified over the
6 course of the case, whether or not such minors are known to the government and/or
7 Defendant at the time the ORDER is entered by the Court.

8 The District Court Executive is hereby directed to enter this Order and
9 furnish copies to counsel.

10 DATED January 20, 2021.



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Thomas O. Rice
THOMAS O. RICE
United States District Judge